

**Commonwealth of Kentucky  
Natural Resources and Environmental Protection Cabinet  
Department for Environmental Protection  
Division for Air Quality  
803 Schenkel Lane  
Frankfort, Kentucky 40601  
(502) 573-3382**

**STATE ORIGIN  
AIR QUALITY PERMIT**

**Permittee Name:** Illinois Tool Works Inc.  
**Mailing Address:** 7080 Industrial Road, Unit 1  
Florence, Kentucky 41042

**Source Name:** ITW/Signode  
**Mailing Address:** Same as Above  
**Source Location:** Florence, Kentucky

**I-STEPS ID #:** 21-117-00171  
**SIC Code:** 3089  
**Regional Office:** Florence Regional Office  
8020 Veterans Memorial Drive  
Suite 110  
Florence, KY 41042  
**County:** Kenton

**Permit Number:** S-02-086  
**Log Number:** 54741  
**Permit Type:** Minor Initial Sourcewide Operating Permit

**Application**  
**Complete Date:** July 11, 2002  
**Issuance Date:** October 10, 2003  
**Expiration Date:** October 10, 2013

---

**John S. Lyons, Director  
Division for Air Quality**

## **SECTION A - PERMIT AUTHORIZATION**

Pursuant to a duly submitted application the Kentucky Division for Air Quality hereby authorizes the construction and operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify an affected facility without first having submitted a complete application and receiving a permit for the planned activity from the Division, except as provided in this permit or in 401 KAR 52:040, State-origin permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining other permits, licenses, or approvals that may be required by the Cabinet or other federal, state, or local agencies.

**SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS****GROUP 001- INDIRECT HEAT EXCHANGERS**

<b>I-STEPS GROUP</b>	<b>Process Unit</b>	<b>Name and Description</b>
001	01	North American Boiler- Strap Lines Natural Gas Fired Installed in 1978, 5.2 mmBtu/hr
	04	Superior Boiler / SSP area Natural Gas Fired Installed in 1978, 2.5 mmBtu/hr
	05	Cleaver Brooks Boiler / PRA Natural Gas Fired Installed in 1978, 8.4 mmBtu/hr
	06	North American Boiler / PRA Natural Gas Fired Installed in 1978, 8.4 mmBtu/hr
	07	North American Boiler / PRA Natural Gas Fired Installed in 1978, 8.4 mmBtu/hr

**APPLICABLE REGULATIONS:**

**401 KAR 59:015 New Indirect Heat Exchangers.** The provisions of this administrative regulation shall apply to each indirect heat exchanger having a heat input capacity of more than one million BTU per hour commenced on or after April 9, 1972.

1. **Operating Limitations:** None

2. **Emission Limitations:**

a. Pursuant to 401 KAR 59:015, Section 4(1)(c), no owner or operator of this affected

**SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS**

facility shall cause to be discharged into the atmosphere particulate matter in excess of 0.424 pounds per million Btu actual heat input.

- b. Pursuant to 401 KAR 59:015 Section 4(2), no owner or operator shall cause to be discharged emissions which exhibit greater than 20 percent opacity.
- c. Pursuant to 401 KAR 59:015, Section 5(1)(c), no owner or operator of this facility shall cause to be discharged into the atmosphere any gases which contain sulfur dioxide in excess of 1.847 pounds per million Btu actual heat input.

**Compliance Demonstration Method:**

- a. Hourly emission rate in lb/mm BTU =  $\frac{[(\text{Total Monthly gas or fuel oil consumption rate in millions of cubic feet} \times \text{Emission factor listed in Kentucky Emissions Inventory}) / (\text{Total Hours of operation per month} \times \text{Total Hourly Rated Capacity})]$
- b. The affected facilities listed above are assumed to be in compliance with opacity.
- c. See the monitoring and recordkeeping requirements below for compliance with PM and SO<sub>2</sub> limits.

**3. Specific Testing Requirements: None****4. Specific Monitoring Requirements:**

- a. The fuel usage shall be monitored on a monthly basis.
- b. Monthly hours of operation shall be monitored.
- c. The fuel sulfur content shall be monitored by obtaining a fuel certification from the supplier to comply with the SO<sub>2</sub> limit.

**5. Specific Recordkeeping Requirements:**

Record the items listed in the monitoring requirements above.

**6. Specific Reporting Requirements: None**

## **SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS**

### **GROUP 003- SOLID STATE MATERIAL HANDLING**

<b>I-STEPS GROUP</b>	<b>Process Unit</b>	<b>Name and Description</b>
003	01	Solid State Material Handling with 31- dust collectors and 7- cyclones Control/Capture efficiency – 90/95 % Installed in 1978, 4.1 tons/hr

### **APPLICABLE REGULATIONS:**

**401 KAR 59:010 New Process Operations.** This regulation shall apply to each affected facility or source associated with a process operation which is not subject to another emission standard with respect to particulates commenced on or after July 2, 1975.

**1. Operating Limitations: None**

**2. Emission Limitations:**

- a. Pursuant to 401 KAR 59:010 Section 3(2), for emissions from a control device or stack no person shall cause, suffer, allow or permit the emission into the open air of particulate matter (PM) from any affected facility which in excess of the quantity described below:

$$E = 3.59(P)^{0.62}$$

E = the PM emissions rate (pounds/hour)

P = the process rate (tons/hour)

- b. The opacity of visible emissions from the solid state processing (SSP) operations shall not equal or exceed 20 percent [401 KAR 59:010, Section 3 (1)].
- c. The control equipment associated with the SSP shall control emissions of particulate matter and be operated properly in accordance with manufacturer's specifications and/or standard operating procedures at all times SSP is in operation. The permittee is required to use the control equipment associated with the SSP operations in order to meet the particulate matter emission standards for the SSP operations.

***Compliance Demonstration Method:***

## **SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS**

a. Mass Emission Standard:

Actual PM Emission Rate = [Amount of polyethylene terephthalate (PET) processed by SSP area per month] x [Emission factor observed during last stack test or Emission factor as listed

in I-STEPS (Use only one)(in pounds PM/per ton PET)] x [Control efficiency] ÷ [Total hours of PET processing during the month]

b. Opacity Limit:

i. During periods of normal operation of the control equipment, no compliance demonstration is necessary.

ii. If the SSP area is in operation during any period of malfunction of its associated control equipment, the permittee shall take necessary corrective actions mentioned in item d, under **Specific Recordkeeping Requirements** below.

c. Use of control equipment:

The permittee shall record the occurrence, duration, cause, and any corrective action taken for each incident when the SSP area is in operation but the corresponding control equipment is not in operation.

3. **Testing Requirements:**

Pursuant to Regulations 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 1, performance testing using the Reference Methods specified in Regulation 401 KAR 50:015 shall be conducted as required by the Division.

4. **Specific Monitoring Requirements:**

The permittee shall monitor the following parameters:

- a. Total weight of PET processed at the SSP area each month.
- b. Total hours of PET processed during the month.
- c. The permittee shall visually inspect the solid state processing area once per week. The weekly inspection shall consist of a visual inspection of the physical condition of the external unit, combined with the corresponding visual emissions observation as outlined below:

Once per calendar day, the permittee shall survey the solid state processing area and maintain a daily log noting the following information:

- (1) Whether any air emissions were visible from any individual stack;
- (2) All emission points from which visible emissions were observed;
- (3) Whether the visible emissions were normal from the stack.

If no visible emissions are observed then no further observations are required.

**SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS**

- d. If visible emissions are observed during a survey, the permittee shall perform a Method 9 reading for emission points of concern. The opacity observed shall be recorded in the daily log. The reading shall be performed by a representative of the permittee certified in Visible Emissions Evaluations. The permittee shall maintain a list of all individuals that are certified Visible Emissions Evaluators and the date of certification.

**5. Specific Recordkeeping Requirements:**

The permittee shall maintain records of the following information:

- a. Total weight of PET processed at the SSP area each month.
- b. Total hours of PET processing during the month.
- c. See Monitoring Requirements above.
- d. For the SSP control equipment, a record of the following information:
  - i. A record of the weekly reading of the pressure loss of the particulate matter through the control equipment as indicated by the continuous monitor.
  - ii. Findings of the weekly visual inspection and any corrective actions taken as a result.
- e. All maintenance activities performed at the control equipment.

**6. Specific Reporting Requirements: None**

## SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

### GROUP 004- MATERIAL STORAGE (SILOS)

I-STEPS GROUP	Process Unit	Name and Description
004	01	Material Storage in sixteen (16) Silos with 31- dust collectors and 7- cyclones Control/Capture efficiency – 90/95 % Installed in 1978, 4.1 tons/hr

### APPLICABLE REGULATIONS:

**401 KAR 59:010 New Process Operations.** This regulation shall apply to each affected facility or source associated with a process operation which is not subject to another emission standard with respect to particulate commenced on or after July 2, 1975.

1. **Operating Limitations** : None

2. **Emission Limitations**:

- a. Pursuant to 401 KAR 59:010 Section 3(2), for emissions from a control device or stack no person shall cause, suffer, allow or permit the emission into the open air of particulate matter (PM) from any affected facility which in excess of the quantity described below:

$$E = 3.59(P)^{0.62}$$

E = the PM emissions rate (pounds/hour)

P = the process rate (tons/hour)

- b. The opacity of visible emissions from the solid state processing operations shall not equal or exceed 20 percent [401 KAR 59:010, Section 3 (1)].
- c. The control equipment associated with the material storage shall control emissions of particulate matter and be operated properly in accordance with manufacturer's specifications and/or standard operating procedures at all times material storage is in operation. The permittee is required to use the control equipment associated with the material storage operations in order to meet the particulate matter emission standards for the material storage.

***Compliance Demonstration Method:***



## SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

a. Mass Emission Standard:

Actual PM Emission Rate = [Amount of polyethylene terephthalate (PET) stored at material storage area per month] x [Emission factor observed during last stack test or Emission factor as listed in I-STEPS (Use only one)(in pounds PM/per ton of PET)] x [Control efficiency] ÷ [Total hours of PET stored during the month]

b. Opacity Limit:

- i. During periods of normal operation of the control equipment, no compliance demonstration is necessary.
- ii. If the material storage area is in operation during any period of malfunction of its associated control equipment, the permittee shall take necessary corrective actions mentioned in item d, under **Specific Recordkeeping Requirements below**.

c. Use of control equipment:

The permittee shall record the occurrence, duration, cause, and any corrective action taken for each incident when the material storage area is in operation but the corresponding control equipment is not in operation.

### 3. Testing Requirements:

Pursuant to Regulations 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 1, performance testing using the Reference Methods specified in Regulation 401 KAR 50:015 shall be conducted as required by the Division.

### 4. Specific Monitoring Requirements:

The permittee shall monitor the following parameters:

- a. Total weight of PET stored at the material storage area each month.
- b. Total hours of PET stored during the month.
- c. The permittee shall visually inspect the material storage area once per week. The weekly inspection shall consist of a visual inspection of the physical condition of the external unit, combined with the corresponding visual emissions observation as outlined below:

Once per calendar day, the permittee shall survey the material storage area and maintain a daily log noting the following information:

- (1) Whether any air emissions were visible from any individual stack;
- (2) All emission points from which visible emissions were observed;
- (3) Whether the visible emissions were normal from the stack.

If no visible emissions are observed then no further observations are required.

- d. If visible emissions are observed during a survey, the permittee shall perform a Method 9

**SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS**

reading for emission points of concern. The opacity observed shall be recorded in the daily log. The reading shall be performed by a representative of the permittee certified in Visible Emissions Evaluations. The permittee shall maintain a list of all individuals that are certified Visible Emissions Evaluators and the date of certification.

**5. Specific Recordkeeping Requirements:**

The permittee shall maintain records of the following information:

- a. Total weight of PET stored at the material storage area each month.
- b. Total hours of PET stored during the month.
- c. See Monitoring Requirements above
- d. For the material storage control equipment, a record of the following information:
  - i. A record of the weekly reading of the pressure loss of the particulate matter through the control equipment as indicated by the continuous monitor.
  - ii. Findings of the weekly visual inspection and any corrective actions taken as a result.
- e. All maintenance activities performed at the control equipment.

**6. Specific Reporting Requirements: None**

## SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

### **GROUP 005 –EXTRUSION**

<b>I-STEPS GROUP</b>	<b>Process Unit</b>	<b>Name and Description</b>
005	01	Two-Extruders Installed in 1978, 4.1 tons/hr

### **GROUP 006 –REACTOR**

<b>I-STEPS GROUP</b>	<b>Process Unit</b>	<b>Name and Description</b>
006	01	Two-Reactors..... Installed in 1996, 4.1 tons/hr

### **APPLICABLE REGULATIONS : None**

1. **Operating Limitations:** None
2. **Emission Limitations:** None
3. **Specific Testing Requirements:** None
4. **Specific Monitoring Requirements:** None
5. **Specific Recordkeeping Requirements:**
  - a. The permittee shall keep calendar month records of the usage of VOC containing material.
  - b. At the end of each month volatile organic compound (VOC) emissions in tons shall be calculated using mass balance and recorded.
  - c. The annual emission for each calendar year shall be calculated and kept available at the

**SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS**

plant site.

- 6. Specific Reporting Requirements:** None

## SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

### GROUP 007- PRA MATERIAL HANDLING

I-STEPS GROUP	Process Unit	Name and Description
007	01	PRA Material Handling with 8-dust collectors and 40-cyclones Control/Capture efficiency – 60 % Installed in 1978, 4.0 tons/hr

### APPLICABLE REGULATIONS :

**401 KAR 59:010 New Process Operations.** This regulation shall apply to each affected facility or source associated with a process operation which is not subject to another emission standard with respect to particulates commenced on or after July 2, 1975.

1. **Operating Limitations** : None

2. **Emission Limitations**:

- a. Pursuant to 401 KAR 59:010 Section 3(2), for emissions from a control device or stack no person shall cause, suffer, allow or permit the emission into the open air of particulate matter (PM) from any affected facility which in excess of the quantity described below:

$$E = 3.59(P)^{0.62}$$

E = the PM emissions rate (pounds/hour)

P = the process rate (tons/hour)

- b. The opacity of visible emissions from the Plastic Recycling Alliance (PRA) operations shall not equal or exceed 20 percent [401 KAR 59:010, Section 3 (1)].
- c. The control equipment associated with the PRA operations shall control emissions of particulate matter and be operated properly in accordance with manufacturer's specifications and/or standard operating procedures at all times PRA is in operation. The permittee is required to use the control equipment associated with the PRA operations in order to meet the particulate matter emission standards for the PRA operations.

***Compliance Demonstration Method:***

## **SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS**

a. Mass Emission Standard:

Actual PM Emission Rate = [Amount of polyethylene terephthalate (PET) processed by PRA area per month] x [Emission factor observed during last stack test or Emission factor as listed in I-STEPS (Use only one)(in pounds PM/per ton PET)] x [Control efficiency] ÷ [Total hours of PET processing during the month]

b. Opacity Limit:

- i. During periods of normal operation of the control equipment, no compliance demonstration is necessary.
- ii. If the PRA area is in operation during any period of malfunction of its associated control equipment, the permittee shall take necessary corrective actions mentioned in item d, under **Specific Recordkeeping Requirements** below.

c. Use of control equipment:

The permittee shall record the occurrence, duration, cause, and any corrective action taken for each incident when the PRA is in operation but the corresponding control equipment is not in operation.

### **3. Testing Requirements:**

Pursuant to Regulations 401 KAR 59:005, Section 2(2) and 401 KAR 50:045, Section 1, performance testing using the Reference Methods specified in Regulation 401 KAR 50:015 shall be conducted as required by the Division.

### **4. Specific Monitoring Requirements:**

The permittee shall monitor the following parameters:

- a. Total weight of PET processed at the PRA area each month.
- b. Total hours of PET processed during the month.
- c. The permittee shall visually inspect the PRA area once per week. The weekly inspection shall consist of a visual inspection of the physical condition of the external unit, combined with the corresponding visual emissions observation as outlined below:

Once per calendar day, the permittee shall survey the PRA area and maintain a daily log noting the following information:

- (1) Whether any air emissions were visible from any individual stack;
- (2) All emission points from which visible emissions were observed;
- (3) Whether the visible emissions were normal from the stack.

If no visible emissions are observed then no further observations are required.

- d. If visible emissions are observed during a survey, the permittee shall perform a Method 9 reading for emission points of concern. The opacity observed shall be recorded in the daily

**SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS**

log. The reading shall be performed by a representative of the permittee certified in Visible Emissions Evaluations. The permittee shall maintain a list of all individuals that are certified Visible Emissions Evaluators and the date of certification.

**5. Specific Recordkeeping Requirements:**

The permittee shall maintain records of the following information:

- a. Total weight of PET processed at the PRA area each month.
- b. Total hours of PET processing during the month.
- c. See Monitoring Requirements above.
- d. For the PRA control equipment, a record of the following information:
  - i. A record of the weekly reading of the pressure loss of the particulate matter through the control equipment as indicated by the continuous monitor.
  - ii. Findings of the weekly visual inspection and any corrective actions taken as a result.
- e. All maintenance activities performed at the control equipment.

**6. Specific Reporting Requirements: None**

**SECTION C – GENERAL CONDITIONS****A. Administrative Requirements**

1. The permittee shall comply with all conditions of this permit. Noncompliance shall be a violation of 401 KAR 52:040, Section 3(1)(b) and is grounds for enforcement action including but not limited to the termination, revocation and reissuance, or revision of this permit.
2. This permit shall remain in effect for a fixed term of ten (10) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division. [401 KAR 52:040, Section 15]
3. Any condition or portion of this permit, which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit.  
[Material incorporated by reference by 401 KAR 52:040, Section 1a, 11]
4. Pursuant to materials incorporated by reference by 401 KAR 52:040, this permit may be revised, revoked, reopened, reissued, or terminated for cause. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance shall not stay any permit condition. [Material incorporated by reference by 401 KAR 52:040, Section 1a, 4,5]
5. This permit does not convey property rights or exclusive privileges. [Material incorporated by reference by 401 KAR 52:040, Section 1a, 8].
6. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance. [401 KAR 52:040 Section 11(3)]
7. This permit shall be subject to suspension at any time the permittee fails to pay all fees within 90 days after notification as specified in 401 KAR 50:038, Air emissions fee. The permittee shall submit an annual emissions certification pursuant to 401 KAR 52:040, Section 20.
8. All previously issued construction and operating permits are hereby subsumed into this permit.



## **SECTION C – GENERAL CONDITIONS**

### **B. Recordkeeping Requirements**

1. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of at least five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality. [401 KAR 52:040 Section 3(1)(f)]
2. The permittee shall perform compliance certification and recordkeeping sufficient to assure compliance with the terms and conditions of the permit. Documents, including reports, shall be certified by a responsible official pursuant to 401 KAR 52:040, Section 21.

### **C. Reporting Requirements**

1. a. In accordance with the provisions of 401 KAR 50:055, Section 1 the permittee shall notify the Division for Air Quality's Florence Regional Office concerning startups, shutdowns, or malfunctions as follows:
    - i. When emissions during any planned shutdowns and ensuing startups will exceed the standards notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
    - ii. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards notification shall be made as promptly as possible by telephone (or other electronic media) and shall cause written notice upon request.
  - b. The permittee shall promptly report deviations from permit requirements including those attributed to upset conditions (other than emission exceedances covered by Reporting Requirement condition 1 a) above) , the probable cause of the deviation, and corrective or preventive measures taken; to the Division for Air Quality's Florence Regional Office within 30 days. Other deviations from permit requirements shall be included in the semiannual report. [Material incorporated by reference by 401 KAR 52:040, Section 5, 3].
2. The permittee shall furnish information requested by the cabinet to determine if cause exists for modifying, revoking and reissuing, or terminating the permit; or compliance with the permit. [Material incorporated by reference by 401 KAR 52:040, Section 1a, 8].

**SECTION C – GENERAL CONDITIONS**

3. Summary reports of monitoring required by this permit shall be submitted to the Division's Florence Regional Office at least every six (6) months during the life of this permit. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during the previous six months because the emission unit was not in operation.
4. The semi-annual reports are due January 30th and July 30th of each year. All reports shall be certified by a responsible official pursuant to 401 KAR 52:040, Section 21. All deviations from permit requirements shall be clearly identified in the reports.

**D. Inspections**

1. In accordance with the requirements of 401 KAR 52:040, Section 3(1)(f) the permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times:
  - a. Enter upon the premises to inspect any facility, equipment (including air pollution control equipment), practice, or operation;
  - b. To access and copy any records required by the permit;
  - c. Inspect, at reasonable times, any facilities, equipment (including monitoring and pollution control equipment), practices, or operations required by the permit. Reasonable times are defined as during all hours of operation, during normal office hours; or during an emergency.
  - d. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements.

**E. Emergencies/Enforcement Provisions**

1. The permittee shall not use as defense in an enforcement action, the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance [Material incorporated by reference by 401 KAR 52:040, Section 1a, 3].
2. An emergency shall constitute an affirmative defense to an action brought for the noncompliance with the technology-based emission limitations if the permittee demonstrates

**SECTION C – GENERAL CONDITIONS**

through properly signed contemporaneous operating logs or relevant evidence that:

- a. An emergency occurred and the permittee can identify the cause of the emergency;
  - b. The permitted facility was at the time being properly operated;
  - c. During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
  - d. The permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division within two working days after the time when emission limitations were exceeded due to the emergency and included a description of the emergency, steps taken to mitigate emissions, and corrective actions taken.
3. Emergency provisions listed in General Condition E.2 are in addition to any emergency or upset provision contained in an applicable requirement.
  4. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof.

**F. Compliance**

1. Periodic testing or instrumental or non-instrumental monitoring, which may consist of record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstration of continuing compliance with the conditions of this permit. For the purpose of demonstration of continuing compliance, the following guidelines shall be followed:
  - a. Pursuant to 401 KAR 50:055, General compliance requirements, Section 2(5), all air pollution control equipment and all pollution control measures proposed by the application in response to which this permit is issued shall be in place, properly maintained, and in operation at any time an affected facility for which the equipment and measures are designed is operated, except as provided by 401 KAR 50:055, Section 1.
  - b. All the air pollution control systems shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers. A log shall be kept of all routine and non routine maintenance performed on each control device.
  - c. A log of the monthly raw material consumption and monthly production rates shall be kept available at the facility. Compliance with the emission limits may be demonstrated by computer program, spread sheets, calculations or performance tests as may be specified by the Division.
2. Pursuant to 401 KAR 52:040, Section 19, the permittee shall certify compliance with the terms and conditions contained in this permit by January 30th of each year, by completing and returning a Compliance Certification Form (DEP 7007CC) (or an approved alternative) to the Division for Air Quality's Florence Regional Office and the U.S. EPA in accordance with the

**SECTION C – GENERAL CONDITIONS**

following requirements:

- a. Identification of the term or condition;
- b. Compliance status of each term or condition of the permit;
- c. Whether compliance was continuous or intermittent;
- d. The method used for determining the compliance status for the source, currently and over the reporting period, and
- e. For an emissions unit that was still under construction or which has not commenced operation at the end of the 12-month period covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.
- f. The certification shall be postmarked by January 30th of each year. Annual compliance certifications should be mailed to the following addresses:

**Division for Air Quality  
Florence Regional Office  
8020 Veterans Memorial Drive  
Suite 110  
Florence, KY 41042**

**Division for Air Quality  
Central Files  
803 Schenkel Lane  
Frankfort, KY 40601-1403**

3. Permit Shield - A permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement prior to or at the time of permit issuance. Compliance with the conditions of this permit shall be considered compliance with all:
  - a. Applicable requirements that are included and specifically identified in this permit; or
  - b. Non-applicable requirements expressly identified in this permit.

**SECTION D- INSIGNIFICANT ACTIVITIES**

The following listed activities have been determined to be insignificant activities for this source pursuant to 401 KAR 52:040, Section 6. While these activities are designated as insignificant the permittee shall comply with the applicable regulation and any level of periodic monitoring specified below.

<u>Description</u>	<u>Generally Applicable Regulation</u>
1. Conair Low Bay Dryer O/L #1 Natural Gas Consumption Installed in 1978, 685 CFH	N/A
2. Conair High Bay Dryer O/L #1 CFH Natural Gas Consumption Installed in 1978, 685 CFH	N/A
3. Hot water heater / PRA Natural Gas Installed in 1978, 0.42 mmBtu/hr	N/A
4. Phase 1 Emergency Generator Natural Gas Fired Installed in 1978, 0.301 mmBtu/hr	N/A
5. Phase 2 Emergency Generator Natural Gas Fired Installed in 1978, 0.905 mmBtu/hr	N/A
6. Phase 3 Emergency Generator Natural Gas Fired Installed in 1978, 0.905 mmBtu/hr	N/A
7. Diesel Emergency Fire Pump Diesel Fired Installed in 1978, 1.35 mmBtu/hr Maximum Operating Hours: 500 hrs/yr	N/A